

83-mj-5168

FILED

AUG 23 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELANDIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

)

v.

) CASE NO.: _____

MAURICE PAYNE, aka JP,
JOEL IRIZARRY,
ALFREDO ESTRADA,

1 : 23 CR 00449

Defendants.

Title 21, United States Code,
Sections 841(a)(1), (b)(1)(A),
(b)(1)(C), 843(b), and 846; Title
18, United States Code, Sections

2, 1952(a)(3), 1956(a)(2)(B)(i)

and (h)

JUDGE NUGENTCOUNT 1(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine,
21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A), and (b)(1)(C))

The Grand Jury charges:

1. From on or about April 1, 2021 to on or about November, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MAURICE PAYNE, JOEL IRIZARRY and ALFREDO ESTRADA, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance. As to Defendant MAURICE PAYNE, he conspired to distribute and possess with the intent to distribute 5,000 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A). As to Defendants JOEL IRIZARRY and ALFREDO ESTRADA, they conspired to

distribute and possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. MAURICE PAYNE obtained kilogram quantities of cocaine from EZC (a person known to the Grand Jury but not indicted herein) for distribution to redistributors and customers who were part of the Drug Trafficking Organization (“DTO”) in the Lorain County, Ohio, area.

B. MAURICE PAYNE distributed cocaine to unknown co-conspirators who redistributed the cocaine to customers in the Lorain County, Ohio, area.

C. JOEL IRIZARRY assisted MAURICE PAYNE in turning over drug proceeds to ALFREDO ESTRADA to be provided to EZC in Mexico.

D. ALREDO ESTRADA was a courier sent by EZC to pick up bulk cocaine proceeds from PAYNE and IRIZARRY.

E. MAURICE PAYNE and others used rental vehicles and cars registered to other persons and businesses to conceal their identities and avoid law enforcement detection.

F. Conspirators used multiple telephones to conduct drug trafficking activity by making and receiving telephone calls, sending and receiving text messages and utilizing WhatsApp to communicate.

G. Conspirators, when using cellular telephones, text messaging, or messaging applications such as WhatsApp to conduct drug trafficking activity, used slang terms,

street terminology, and code words and phrases to obscure and disguise the true nature of their activities and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect and conceal the existence of the conspiracy, the Defendants and others performed acts in the Northern District of Ohio and elsewhere, including but not limited to the following:

4. On or about April 2, 2021, PAYNE sent EZC two photographs using WhatsApp. The first picture was a kilogram of cocaine with the imprint “HURLEY” and the bottom corner of the kilogram broken off. The second picture is of broken-off pieces of a kilogram of cocaine.

5. On or about April 5, 2021, EZC sent PAYNE a WhatsApp message stating “Victor 515-744-8173” (name and telephone number for an unknown courier, not indicted herein).

6. On or about April 6, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC sent PAYNE a photograph which stated, “Ask for Victor part of mia, Cel: 15157448173 (Text only by WhatsApp, Signal or Telegram) (solo texto por WhatsApp, Signal, o Telegram) Akron, Ohio de 250k Abril 05, 2021.” PAYNE responded “Ok I got it.” PAYNE then sent EZC a screenshot of his communication with “Victor.” In the screenshot, PAYNE said, “Hey Victor this is primo I will be in town tomorrow so how about Thursday afternoon for our meeting.” In the screenshot, “Victor” responded, “Hello good afternoon, I will check the schedule and I will confirm if I can for Thursday or for what day could I receive it.” PAYNE responded in the screenshot, “Ok thank you.”

7. On or about April 7, 2021, PAYNE sent a WhatsApp message to “Victor.”

PAYNE said, “Hello Victor, I’m only in town until Saturday. How is your day looking tomorrow.”

8. On or about April 9, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC sent PAYNE a message stating, “6XXX Sioux Falls, Brownsville, Texas 78521.” PAYNE then sent EZC five photographs via WhatsApp. The first photograph was a brick of cocaine on a digital scale, showing the weight of 935 grams. The second photograph is of a brick of cocaine on a digital scale weighing 937 grams. The third photograph shows at least three bricks of cocaine; one is on a scale weighing 930 grams and the other two still have the packaging on them. The fourth photograph is a brick of cocaine on a digital scale weighing 1,015 grams. The fifth photograph is a screen shot of a conversation between PAYNE and Victor. In the screenshot conversation, Victor sent a message to PAYNE stating, “Hello, good night, an apology but we can’t be there to greet you.”

9. On or about April 10, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “I’m at the circus give me 30 minutes.” PAYNE responded “Ok.” EZC replied, “Tracking number.” PAYNE then sent a photograph to EZC via WhatsApp showing a money order fee with tracking number EE380053895US.

10. On or about April 12, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC sent four WhatsApp photographs showing that he received the USPS package. The first photograph shows that the shipper was JP PAYNE 9XX W.29th Street, Lorain, Ohio 44052 (a residence then-owned by PAYNE) with tracking number EE380053895US. The next two photographs are of the package, and the last photograph shows the parcel recipient information (known to the Grand Jury but not included herein). PAYNE sent a WhatsApp

message to EZC stating, “We gotta tighten up bro, I had dream I got picked up by the feds this morning so no more rushing anything we gone do it right with no mishaps!!!!”

11. On or about April 21, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “I need a new horn (telephone number) n count (drug trafficking proceeds amount).” EZC continued in another message, “We need that horn (telephone number) Chi town (members of the conspiracy based in Chicago) just called me that they called him already.” PAYNE responded, “ok”. EZC said, “call me,” then “Number bro.” PAYNE responded, “Getting phone activated now. I’m at the store. 1-440-654-6296.” EZC replied, “let me know if they (members of the conspiracy based in Chicago) call.” PAYNE responded, “Ok, I’ve called a few times.” PAYNE then sent photograph to EZC via WhatsApp. The picture is a screen shot showing that PAYNE called (520) 404-1596. EZC asked, “Did they call” and PAYNE replied, “Yeah I just talk to them.”

12. On or about April 21, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Don’t call them people no more.” EZC then sent a photograph to PAYNE that said: “Ask for part Javier of Fernando Cel:1-6462016030” and instructed PAYNE to only use an encrypted messaging application. PAYNE then sent several screenshots to EZC showing that he reached out to Javier and asked for a delivery time and location for the following day. PAYNE sent EZC a video, labeled in the conversation as “200k,” showing several heat-sealed bags of U.S. currency all marked “\$20k.” PAYNE then sent EZC another screenshot of the conversation between PAYNE and Javier. In this screenshot conversation, Javier said “Ok to order to serve you.” PAYNE then sent EZC another video showing that he (PAYNE) has numerous heat-sealed bags full of U.S. currency. During this video, PAYNE audibly said, “three hundred thousand packaged.” PAYNE then sent EZC a video during which PAYNE said, “two

hundred thousand ready for tomorrow.” PAYNE then sent EZC a screenshot of his conversation with Javier that is continued from his previous conversations. In the screenshot conversation with Javier, PAYNE and Javier coordinated a meeting on April 22, 2021 where PAYNE would deliver \$200,000.00. After the screenshot, EZC asked PAYNE, “Did they answer.” PAYNE responded, “No.” EZC then instructed PAYNE to only use an encrypted messaging application.

13. On or about April 22, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE sent ECZ a WhatsApp photograph showing a hand-written receipt from the courier, stating “I am receiving the amount of 200k today April 22, 2021. Not staying to count it for which I am not responsible in case of any missing by delivering document number C73764246B.” PAYNE then sent a WhatsApp message to EZC, “Drop made serial code is on receipt.”

14. On or about April 25, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE said, “I got all my work done for the week and package bread (U.S. currency).” EZC responded, “I don’t care if you get pissed off bro wat part bro I only turn in 200 (\$200,000.00 U.S. Currency to suppliers).” PAYNE replied, “bro they (the courier) would only take 200 (\$200,000.00), I sent a video of 500 (\$500,000.00).” EZC said, “Well they gonna b there Monday bro,” then, “I need a horn (telephone number) from u so they can call u Sunday night.” PAYNE responded, “same horn (same phone number as last time).” EZC said, “they going to call tonight. They calling the other horn bro.” PAYNE replied, “ok let me grab it.” EZC said, “ok talk to them n see when they b there.” PAYNE replied, “Tomorrow afternoon.”

15. On or about April 26, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE sent a video, labeled in the conversation as “400k” to EZC via WhatsApp depicting numerous heat-sealed packages of U.S. currency. EZC responded with a thumbs up

emoji. Later, EZC called PAYNE via WhatsApp four times, but PAYNE did not answer. PAYNE then sent a message to EZC via WhatsApp, “3XXX Oberlin Ave, Lorain Oh.” EZC responded, “she there (Courier at the McDonald’s located at 3XXX Oberlin Avenue, Lorain, Ohio).” PAYNE replied, “ok.”

16. On April 28, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Nephew 126,500.” PAYNE responded, “48k out of the 30 and 40k for the 20 (\$48,000.00 payment for the distribution of 30 kilograms of cocaine, and \$40,000.00 payment for the distribution of 20 kilograms of cocaine).” PAYNE then sent a video, labeled in the conversation as “126,500 +50,000” to EZC via WhatsApp depicting numerous heat-sealed packages of U.S. currency with different markings.

17. On or about May 8, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC asked, “U at the O (are you in Ohio).” PAYNE responded “yeah.” EZC said, “call me.”

18. On or about May 9, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “I’m gonna need a number bro. Don’t forget the number bro.” “Have they (other conspirators) call.”

19. On May 11, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE sent a video, labeled in the conversation as “120k” to EZC, depicting numerous packages of heat-sealed currency.

20. On or about June 1, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “They (courier) going to be there (Ohio) Wednesday night,” then said, “They need a number.” PAYNE responded, “So they’ll be there Thursday.” PAYNE then said,

"I'll be there (Ohio) Wednesday afternoon or evening." EZC said, "Bro b there tonight."

PAYNE responded, "I won't."

21. On or about June 2, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC sent PAYNE a screenshot of his (EZC's) conversation with another person, which read, in part, "Columbus#614-683-2506" and "B 85975600 E (serial number of U.S. Currency)." PAYNE asked, "That's the number?" EZC said, "yes," then, "Call them n see what they say."

22. On or about June 3, 2021, at approximately 2:14 p.m. PAYNE sent a video via WhatsApp, labeled in the conversation as "350k (\$350,000.00)," to EZC depicting a black duffle bag containing numerous bags of currency in vacuum sealed bags. During the video, PAYNE audibly said, "three hundred and fifty k (\$350,000.00)."

23. On or about June 3, 2021, at approximately 2:34 p.m., PAYNE arrived at the McDonald's restaurant at 3XXXX Colorado Avenue, Avon, Ohio, driving a red Jeep Wrangler. PAYNE remained in the driver's seat of the red Jeep Wrangler. PAYNE yelled to an Undercover Drug Enforcement Administration Agent ("UC"), "it's (\$350,000.00 of drug proceeds) in the backseat." The UC asked PAYNE if he was "600E (the last four digits of the U.S. Currency code)." PAYNE responded, "Yeah." The UC grabbed a black duffle bag containing \$350,000.00 of drug proceeds from the backseat of the red Jeep Wrangler. The UC asked PAYNE, "how much is in here?" PAYNE replied, "350 (\$350,000.00)." The UC placed the duffle bag of currency in the UC's vehicle. PAYNE departed the McDonalds in the red Jeep Wrangler and drove to 9XX West 29th Avenue, Lorain, Ohio.

24. On or about June 3, 2021, between approximately 3:01 p.m. and 4:16 p.m., PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, "Call me." PAYNE said,

“Give me a moment.” EZC asked, “Bro did the guy give u a bill,” then said, “Call me ASAP bro.” PAYNE responded, “Checking on Pops give me a moment,” then, “He gave me the serial code.” EZC said, “send it to me.” PAYNE replied, “He just read it off it was the one on his phone,” then “Same one I gave you.” EZC said, “What u give me.” PAYNE then sent a picture of a dollar bill with serial number L40686941I. EZC responded, “He was supposed to give u one call him n tell him to send u a pic of it.” PAYNE replied, “Ok.” EZC said, “Call him bro,” then, “U have to get that bill.” PAYNE said, “Bro chill.” EZC said, “I don’t want to bother u bro but you have to go get that bill bro.” PAYNE then sent a photo of a dollar bill with serial number B85975600E.

25. On or about June 4, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “They (other conspirators) say it (drug proceeds delivered by PAYNE on June 3, 2021) was 329 (\$329,000.00) not 350 (\$350,000.00).” PAYNE responded, “Man f*** them.”

26. On or about June 5, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC asked, “they never called you red sox,” then, “Did they call you.” Then, EZC said, “Well things are looking bad for chi town (conspirators in Chicago) they might pick up work (additional clientele) so we have too figure out wat we owe n give them back their work.” PAYNE then sent a video, labeled in the conversation as “all here,” via WhatsApp, showing at least ten kilograms of cocaine packaged.

27. On or about June 6, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC told PAYNE, “they about to call you bro.” PAYNE responded, “in route.” Approximately forty minutes later, PAYNE said, “done.” EZC said, “20.” PAYNE responded, “No 2.” EZC asked, “wat,” then “How Many.”

28. On or about June 8, 2021, EZC asked PAYNE via WhatsApp “Bro when they drop the 20 they took back wat did you give them on cash.” PAYNE did not respond.

29. On or about June 9, 2021, EZC sent PAYNE a WhatsApp message that said, “Hurley’s (kilograms of cocaine) at 25 (\$25,000.00 per kilogram).”

30. On or about June 17, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Call me or I need the spot for driver.” Then, “I’m at the store, talk to Pete they can b there Monday, H town (Houston, Texas).” PAYNE responded, “Perfect.” EZC said, “they need the spot (transaction location).” PAYNE replied, “1XXX Colorado Avenue, Lorain Ohio 44052.”

31. On or about June 20, 2021, EZC sent PAYNE a WhatsApp message “Bro red Sox is gonna pick that up tomorrow.”

32. On or about June 21, 2021, PAYNE and EZC engaged in a conversation on WhatsApp regarding a drug proceed transaction for \$283,000.00 on June 21, 2021 in Akron, Ohio. EZC sent PAYNE a WhatsApp message stating “Ohio \$250k (\$250,000.00) K82380350D (U.S. Currency serial number) 1-3464388873.” EZC then sent a screenshot to PAYNE which said, “Ask for pepe part of chayo Cel:1-2165079600” and instructed PAYNE to only use an encrypted messaging application. PAYNE responded, “ok”.

33. On or about June 22, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE said, “I called and text both numbers, no anser.” PAYNE then sent a video, labeled in the conversation as “283k (\$283,000.00) long!!!” The video depicts fourteen packages of heat-sealed currency. EZC responded, “Bro I guess one of them people r there call them.” PAYNE sent a screenshot of a conversation between PAYNE and contact listed as

“Pickup 1.” In the screenshot conversation, PAYNE and “Pickup 1” attempt to set a transaction place and time, but cannot agree. PAYNE then asked EZC for Damian’s bank info again.

34. On or about July 6, 2021, EZC asked PAYNE via WhatsApp, “Did u go to the o (Ohio),” then “Have they called you.”

35. On or about July 7, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Bro make sure u sent the 17 bands (\$17,000.00) too,” then, “Did u see nephew.” PAYNE responded, “Yeah.” EZC asked, “How much (drug proceeds) you give him?” PAYNE replied, “20k (\$20,000.00).” EZC asked, “Wat happen to the other 7 (\$7,000.00).”

36. On or about July 10, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE then sent a video, labeled in the conversation as “282k (\$282,000.00).” The video shows multiple packages of heat-sealed currency, and PAYNE audibly counts \$282,000.00. EZC responded, “My brother,” then asked, “How much you give nephew.” PAYNE responds “20k.”

37. On or about July 18, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “31500 (\$31,500.00 per kilogram of cocaine).” PAYNE responded, “31 (\$31,000.00 per kilogram of cocaine).” EZC replied, “ok.” PAYNE said, “31 (\$31,000.00 per kilogram of cocaine) is meeting y’all half way,” then, “they (suppliers) need to do the same,” then, “It should be less (per kilogram of cocaine) and we know that.” EZC said, “H town (Houston-based suppliers) from 32 (\$32,000.00 per kilogram of cocaine) went down to 29.5 (\$29,500.00 per kilogram of cocaine).” PAYNE responded, “I’m not making much if you guys aren’t and I’m doing all of the work I mean all traveling catching packaging counting taking risk pay me my worth you feel me.”

38. On or about July 26, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC asked, "Have they called." PAYNE responded, "No," then, "Get on it we missed a lot of days." EZC replied, "It's ok he (courier) in the o (Ohio) already it'll (transaction) be tomorrow." PAYNE responded, "Good because I'm bored !!!!"

39. On or about July 28, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE then sent a video, labeled in the conversation as "150k (\$150,000.00)." The video shows multiple packages of heat-sealed currency, and PAYNE audibly counts \$150,000.00.

40. On or about July 31, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, "What u owe (drug sales proceeds to supplier) is 254 (\$254,000.00)." PAYNE responded, "No I don't owe the, that muck," then, "Much." EZC replied, "Yes," then, "Bro."

41. On or about August 1, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE said, "They haven't called, I called him last night." EZC responded, "Well call him see was up." EZC then said, "Nothing." Approximately an hour later, EZC then wrote, "5599422744," and instructed, "Ask for triste from polo, call him let me know what they say bro." Approximately three hours later, EZC said, "He will b there at 8." PAYNE replied, "ok cool." EZC said, "25 minutes," and asked, "U ready." EZC continued, "He gonna check with his people if he can do that." Later, EZC said, "Go get them (kilograms of cocaine) and to wait for you on the bread (payment for the cocaine)." PAYNE then sent a video, labeled in the conversation as "254k (\$254,000.00)." The video shows multiple packages of heat-sealed currency. EZC replied, "Ok go to work." EZC then said, "No 25." Later, EZC said, "Send me a

picture or video that is 20 (kilograms of cocaine).” PAYNE then sent a video of twenty kilograms of cocaine.

42. On or about August 30, 2021, PAYNE possessed 1,140.50 grams of marijuana and one peach colored Apple iPhone with a clear plastic case used to communicate with EZC via WhatsApp.

43. On or about September 13, 2021, possessed the Apple iPhone used to communicate with EZC via WhatsApp at the Hartsfield-Jackson Atlanta International Airport.

44. On or about September 16, 2021, PAYNE travelled from Atlanta, Georgia to Cleveland, Ohio.

45. On or about October 8, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Bro call Pete so u can explain to him that everything it's ok,” then provided PAYNE with a telephone number for “Pete.” PAYNE responded, “Ok.” Later, EZC said, “U have to tell me something so I can tell these people something,” then “If u talk to Pete don't tell him u in the atl (Atlanta, Georgia) just u out of town not to far.” EZC then said, “Pete asked me to tell you that plz Call grandpa that he is gonna wait for you plz.”

46. From on or about October 8, 2021, to on or about October 9, 2021, PAYNE travelled from Atlanta, Georgia to Cleveland, Ohio.

47. On or about October 13, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. At approximately 8:44 p.m., EZC said, “Number bro.” At approximately 9:36 p.m., EZC said, “9564437789.”

48. On or about October 14, 2021, between approximately 12:30 p.m. and 3:10 p.m., PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Bro u think u can do my paycheck on paint,” (payment for the distribution of kilograms of cocaine) then, “The one u was

giving my son last time.” PAYNE responded, “I told yesterday I’m adding it to the truck (tractor-trailer being sent by EZC).” EZC said, “ok,” then asked, “How much u putting in the truck.” PAYNE responded, “U said 200 (\$200,000.00) right.”

49. On or about October 14, 2021, at approximately 5:22 p.m., D.G. (a person known to the Grand Jury but not indicted herein) arrived in front of 1XXX West 10th Street operating a black Chevy Equinox (Florida license plate). D.G. exited the driver's seat of the Equinox and greeted the other individuals standing outside of 1XXX West 10th Street. After approximately five minutes, D.G. re-entered the driver's seat of the Equinox. PAYNE entered the front passenger seat of the Equinox. The Equinox departed from 1XXX West 10th Street. D.G. drove the Equinox and PAYNE to 1XX East 10th Street, Lorain, Ohio.

50. On or about October 14, 2021, at approximately 5:35 p.m. EZC sent PAYNE a WhatsApp message, “He already waiting for u where you told him to.”

51. On or about October 14, 2021, at approximately 5:39 p.m., PAYNE exited the front passenger seat of the Equinox and entered the front door of 1XX East 10th Street empty-handed. At approximately 5:42 p.m., PAYNE dropped a black duffle bag (containing approximately \$200,000.00 in drug sales proceeds) from a third-story balcony located on the northeast side of the building. At the same time, D.G. exited the driver's seat of the vehicle and retrieved the black duffle bag from the ground, which had been dropped by PAYNE. D.G. placed the duffle bag into the back passenger seat of the Equinox. At approximately 5:46 p.m., PAYNE exited 1XX East 10th Street and entered the driver's seat of the Equinox. D.G. entered the front passenger seat of the Equinox, and PAYNE drove the Equinox away.

52. On or about October 14, 2021, at approximately 6:01 p.m., PAYNE arrived at the McDonald's restaurant, located at 3XXXX Colorado Avenue, Avon, Ohio, operating the Chevy

Equinox. PAYNE entered the drive-through line of the McDonald's, still operating the Equinox. At approximately 6:04 p.m., J.A. (a person known to the Grand Jury but not indicted herein) entered the back passenger side of the Equinox while it remained in the drive-through line. A short time later, after receiving their drive-through order, PAYNE, D.G., and J.A. drove to the Pilot gas station located at 3XXXX Colorado Avenue, Avon, Ohio.

53. On or about October 14, 2021, at approximately 6:13 p.m., D.G. exited the front passenger seat of the Equinox and walked into the gas station. At approximately 6:17 p.m., D.G. exited the gas station and entered the front passenger seat of the Equinox. The Equinox, still operated by PAYNE then departed. PAYNE drove the Equinox through the city of Avon, Ohio.

54. On or about October 14, 2021, at approximately 7:15 p.m., the black Equinox was located at 1XXX West 10th Street.

55. On or about October 14, 2021, at approximately 9:15 p.m., J.A. operated a blue tractor-trailer with Rocket Transport, LLC. south on Ohio State Route 83. J.A. drove the tractor-trailer to the Pilot gas station located at 1XXXX Avon Lake Road, Burbank, Ohio and pulled to the parking area of the gas station where it remained for several hours.

56. From on or about October 14, 2021, at approximately 10:05 p.m. to on or about October 15, 2021 at approximately 12:57 a.m., PAYNE and EZC engaged in a conversation on WhatsApp. EZC asked, "Everything ok," then, "U ok." PAYNE responded, "Yeah I called you."

57. On or about October 18, 2021, J.A. operated the blue Rocket Transport, LLC tractor-trailer near Brownsville, Texas.

58. On or about October 29, 2021, PAYNE travelled from Atlanta, Georgia to Cleveland, Ohio.

59. On or about October 30, 2021, PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Bro h town (Houston supplier) wants to go Tuesday too pick up bread (U.S. currency/proceeds),” then, “And hurley (another cocaine supplier) wants to pick up (pick up and deliver kilogram quantities of cocaine) too next week.”

60. On or about October 30, 2021, between approximately 2:02 p.m. and 3:04 p.m., PAYNE and EZC engaged in a conversation on WhatsApp. PAYNE said, “Send me the horn (phone number) for this people (for a cocaine and/or proceeds transaction).” EZC responded, “They said they will be there tomorrow,” then, “9563717521 (phone number for transaction contact).”

61. On or about October 30, 2021, between approximately 7:14 p.m. and 8:07 p.m., PAYNE and EZC engaged in a conversation on WhatsApp. EZC said, “Call pete.” PAYNE responded, “Ok.”

62. On or about October 31, 2021, between approximately 8:09 p.m. and 10:36 p.m., PAYNE and J.M., a contact saved in PAYNE’s phone as “Pistol Pete” (a person known to the Grand Jury but not indicted herein) engaged in a conversation on WhatsApp. The two exchanged greetings, then PAYNE said, “call me.” J.M. responded, “I’m at a rosary,” then, “really need your help brother please,” then, “I need u to see these guys It will just be anywhere not They don’t need a place.” J.M. continued, “please,” then, “Whatever you have.” J.M. continued, “Please need your help,” then, “Can u see then tomorrow?” J.M. asked, “How much do you have ???” PAYNE replied, “Video chat when you get a chance.” PAYNE continued, “I just got here (Ohio) yesterday I was at a funeral myself still have to pick up bread (drug proceeds) from guys (subordinate dealers).” J.M. said, “Please get a phone So they can call u Tell them tomorrow night I have no option.” J.M. continued, “They think I’m bull s*****ing

them," then, "Please bro," then, "Please send us a number." J.M. continued, "All day they have been waiting on a number," then, "Please u have to see them tomorrow."

63. On or about November 1, 2021, at approximately 7:49 p.m., IRIZARRY arrived at 1XX East 10th Street in a Nissan Titan and parked behind a gray Ford F-150 that PAYNE was driving. IRIZARRY exited the Nissan Titan and went into the apartment building.

64. On or about November 1, 2021, at approximately 7:59 pm, IRIZARRY called PAYNE on the telephone.

65. On or about November 1, 2021, at approximately 8:14 p.m., PAYNE exited the apartment building at 1XX East 10th Street carrying a bag. IRIZARRY followed PAYNE out of the building. At approximately 8:50 p.m., IRIZARRY departed in the Nissan Titan and drove in a circuitous route for approximately thirty minutes from Lorain, Ohio to Avon, Ohio and then back to Lorain.

66. On or about November 1, 2021, at approximately 9:10 p.m., ESTRADA called IRIZARRY on the telephone.

67. On or about November 1, 2021, at approximately 10:33 p.m., IRIZARRY called ESTRADA on the telephone.

68. On or about November 1, 2021, at approximately 10:37 pm, ESTRADA called IRIZARRY on the telephone.

69. On or about November 1, 2021, at approximately 10:40 p.m., IRIZARRY arrived at and circled the Pilot gas station parking lot located at 3XXXX Colorado Avenue, Avon, Ohio in a white Nissan. IRIZARRY then exited the front passenger seat of the Nissan. IRIZARRY went to the passenger side of a tractor-trailer bearing Texas registration: RXXXXXX, operated by ESTRADA.

70. On or about November 1, 2021, at approximately 10:41 p.m., IRIZARRY called PAYNE on the telephone.

71. On or about November 1, 2021, at approximately 10:47 p.m., ESTRADA departed the Pilot gas station, operating the tractor-trailer bearing Texas registration: RXXXXXXX, entered Westbound I-90, and continued to Interstate 80.

72. On or about November 1, 2021, at approximately 11:57 p.m., the Ohio State Highway Patrol stopped ESTRADA, operating the tractor-trailer bearing Texas registration: RXXXXXXX in Harris Township, Ohio. Inside the cab of the trailer, near the bed area, ESTRADA possessed a large cardboard box containing six heat-sealed bags of US currency, totaling \$120,110.00. ESTRADA also possessed a Smith and Wesson 9mm pistol with 8 rounds of ammunition inside of the tractor.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(International Money Laundering Conspiracy, 18 U.S.C. §§ 1956(a)(2)(B)(i) and (h))

The Grand Jury further charges:

73. The factual allegations in Count 1 are realleged and incorporated by reference as if fully set forth herein.

74. From on or about April 1, 2021 to on or about November, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MAURICE PAYNE, JOEL IRIZARRY and ALFREDO ESTRADA, the defendants herein, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit: transport, transmit, transfer, and attempt to transport, transmit, transfer monetary instruments and funds, that is United States currency, from a place in the United States,

that is the State of Ohio to a place outside the United States, that is Mexico, knowing that the monetary instruments involved in the transportation represented the proceeds of some form of unlawful activity and knowing that such transportation was designed in whole or in part to conceal and disguise the nature, location, source, ownership, or control of the proceeds of specified unlawful activity, to wit: the distribution of cocaine, in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i).

75. All in violation of Title 18, United States Code, Section 1956(h).

COUNT 3
(Interstate Travel in Aid of Racketeering, 18 U.S.C. § 1952(a)(3))

The Grand Jury further charges:

76. On or about October 29, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MAURICE PAYNE did travel in interstate commerce between the State of Georgia and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and then said MAURICE PAYNE thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3).

COUNT 4
(Interstate Travel in Aid of Racketeering, 18 U.S.C. §§ 1952(a)(3) and 2)

The Grand Jury further charges:

77. From on or about October 28, 2021 to on or about November 1, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant ALFREDO ESTRADA

did travel in interstate commerce between the State of Texas and the State of Ohio, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and then said ALFREDO ESTRADA thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNTS 5-6

(Use of a Communications Facility to Facilitate a Felony Drug Offense, 21 U.S.C. § 843(b))

The Grand Jury further charges:

78. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the Defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Sections 846 and 841(a)(1):

Count	Defendants	Date	Time (EST)
5	MAURICE PAYNE	June 3, 2021	11:14 a.m.
6	MAURICE PAYNE	October 31, 2021	8:09 p.m. – 10:36 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, § 853 and Title 18, United States Code, §§ 981 and 982, and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 6 are incorporated herein by reference. As a result of the foregoing offenses,

Defendants, MAURICE PAYNE, JOEL IRIZARRY and ALFREDO ESTRADA, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; any property real or personal, which constitutes or is derived from proceeds traceable to a violation of the charges set forth herein; and any and all property, real or personal, involved in such offenses and any property traceable to such property.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.

United States v. Maurice Payne, aka JP, et al.

A TRUE BILL.

FOREPERSON

By: _____
Robert F. Corts, Chief
OCDETF Unit

23-mj-5168

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

2023 AUG 24 A 8:51

U.S. MARSHALS
CLEVELAND, OH

United States of America

v.

Joel Irizarry

Case No.

1 : 23 CR 00449

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) Joel Irizarry,

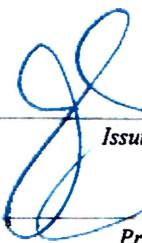
who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

21 U.S.C. 846, 841(a)(1) and (b)(1)(C) - Conspiracy to Distribute and Possession with Intent to Distribute Controlled Substances

18 U.S.C. 1956(a)(2)(B)(i) and (h) - International Money Laundering Conspiracy

Date: 8-23-23City and state: Cleveland, Ohio

Issuing officer's signature

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

*Arresting officer's signature**Printed name and title*